

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In Re: Sophia Washington
Debtor

Case No. 14-25726-svk
Chapter 13

STIPULATION RE MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Milwaukee Habitat for Humanity, Inc. ("Milwaukee Habitat"), a secured creditor, by its attorneys Quarles & Brady LLP, Sophia Washington, Debtor, through her attorney Daniel T. Beasley, and the Chapter 13 Trustee Mary B. Grossman hereby stipulate and agree to the entry of an Order Denying Relief From Stay on Conditions. In support of this Stipulation, the parties hereby submit the following:

1. Debtor filed a Chapter 13 Bankruptcy Petition on May 6, 2014. Rebecca Garcia has been appointed Trustee.
2. Milwaukee Habitat holds a first Mortgage lien, securing a Consumer Universal Note in the original amount of \$67,500.00, dated June 16, 2006, against real estate owned by the debtor located at 2446 North 33rd Street, Milwaukee, WI 53210 (the "Collateral").
3. Monthly installments for principal and escrow are \$428.00 per month, plus a late fee for payments after the 15th of \$15.00 per month. Milwaukee Habitat does not receive any interest on the amounts due under the Note and Mortgage.
4. The post petition arrearage as of September 3, 2015 is \$3,577.00.

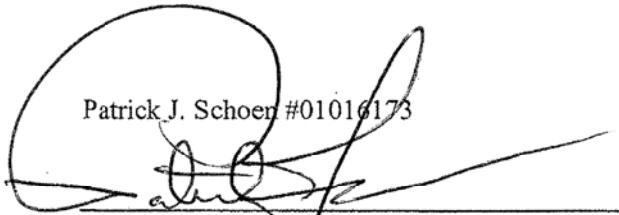
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**ACCORDINGLY THE PARTIES STIPULATE THAT AN ORDER MAY BE
ENTERED PROVIDING:**

- 1) As and for adequate protection of Milwaukee Habitat's first mortgage lien security interest with respect to the Collateral, Debtor shall pay all monthly mortgage payments and all escrow payments due on and after October 1, 2015 on a timely basis (defined as on or before the 1st of each month). Payments shall be made payable to and shall be sent to Milwaukee Habitat for Humanity, Inc., 3726 North Booth Street, Milwaukee, WI 53212.
- 2) Additionally, Debtor shall pay an extra \$200 per month for the nine month period from October 1, 2015 through June 1, 2016.
- 3) Debtor shall also keep current with her payments with the City of Milwaukee Water Works.
- 4) Milwaukee Habitat is awarded \$800 for the costs and attorneys fees of filing its motion.
- 5) Milwaukee Habitat may file a supplemental claim for the additional post petition arrearage through September 3, 2015 of \$3,577.00, plus the \$800 costs, less the projected extra payments of \$1,800 (a total of \$2,577.00).
- 6) The "adequate protection period" shall be the period from October 1, 2015 through and including June 1, 2016.
- 7) After the adequate protection period Milwaukee Habitat may renew its motion by letter to the Court for the duration of the Plan.
- 8) The plan payments by the debtor shall be increased to accommodate the supplemental claim.

Dated this 4th day of September, 2015.

Patrick J. Schoen #01016173

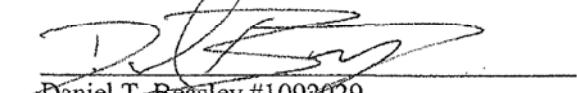


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Attorneys for Milwaukee Habitat

Dated this 3rd day of September, 2015.

DeLadurantey Law Office, LLC



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735 West Wisconsin Avenue, Suite 720
Milwaukee, WI 53233
(414) 377-0515
Attorneys for Debtor

Dated this _____ day of September, 2015.

Rebecca Garcia, Chapter 13 Trustee
Digitally signed by Rebecca A
Quiroz
DN: cn=Rebecca A Quiroz, o=Ch13, o=Chapter 13 Trustees Oshkosh, email=rebecca@ch13oshkosh.com
Date: 2015.09.04 15:13:11 -05'00'

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Chapter 13 Trustee